

JD:AL
F. #2013R00072

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

MICHAEL STERN,

Defendant.

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THE UNITED STATES ATTORNEY CHARGES:

COUNTS ONE AND TWO
(Falsely Subscribing to Tax Returns)

On or about the dates set forth below, within the Eastern District of New York and elsewhere, the defendant MICHAEL STERN, a resident of Brooklyn, New York, did willfully make and subscribe to joint U.S. Individual Income Tax Returns, Forms 1040, for each of the calendar years set forth below, each of which was verified by a written declaration that it was made under penalties of perjury. The defendant MICHAEL STERN did not believe the returns, which were filed with the Internal Revenue Service, to be true and correct as to one or more material matters in that the returns failed to disclose income earned from his business activity. The defendant MICHAEL STERN then and there well knew and believed that he was required by law and regulation to disclose all the income derived from the business activity, but failed to disclose such income. The defendant MICHAEL STERN then and there

INFORMATION

Cr. No. 16 - 154 (PG)
(T. 26, U.S.C., § 7206(1); T. 18,
U.S.C., §§ 2 and 3551 et seq.)

well knew and believed that his actual, total income was in excess of the total income reported in his tax returns, as set forth below:

COUNT	TAX YEAR	APPROXIMATE DATE OF FILING	FALSELY CLAIMED INCOME	ACTUAL, TOTAL INCOME
1	2006	October 19, 2007	Line 22: \$203,969	Line 22: \$653,968.56
2	2007	October 17, 2008	Line 22: \$47,622	Line 22: \$254,403.24

(Title 26, United States Code, Section 7206(1); Title 18, United States Code, Sections 2 and 3551 et seq.)



ROBERT L. CAPERS
United States Attorney
Eastern District of New York